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October 10, 2024

VIA FEDEX DELIVERY

Gail Marchione
Deputy Clerk
United States District Court
District of Massachusetts
1 Courthouse Way
Boston, MA 02210

RE: *United States of America v. Kingsley Chin, et al.*
Case No. 1:21-cr-10256-IT
Strong & Hanni and Peter J. Baxter's Response to Subpoena from U.S. Attorney

Dear Ms. Marchione:

Pursuant to Judge Talwani's Memorandum & Order (dated June 7, 2024) [Doc. No. 179] and in response to the Subpoena (dated August 20, 2024) directed to the law firm of Strong & Hanni, P.C., enclosed please find the following:

1. Sealed envelope containing responsive documents to the Subpoena, Bates stamped SH_000001 – SH_000869
2. Privilege log for the produced documents SH_000001 – SH_000869
3. Sealed envelope containing documents that are mixed privileged and non-privileged (the privileged portion of those documents are redacted) with the following Bates stamped pages:
 - SH_000326 – SH_000329
 - SH_000337 – SH_000343
 - SH_000350 – SH_000357
 - SH_000384 – SH_000389
 - SH_000390 – SH_000401
 - SH_000587 – SH_000592
 - SH_000595 – SH_000605
 - SH_000608 – SH_000616

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- SH_000635 – SH_000642
- SH_000668 – SH_000670
- SH_000689 – SH_000692
- SH_000722 – SH_000727
- SH_000752 – SH_000760
- SH_000761 – SH_000769
- SH_000844 – SH_000851
- SH_000856 – SH_000865

As stated in the Order, these documents are to remain under seal unless and until Defendants invoke an advice/involvement-of-counsel defense, at which point the court will “refer review of the sealed documents produced in any response to any such subpoena to the magistrate judge assigned to this matter for in camera review, unseal those documents relating to the subject matter of the Letters, and order them produced to the government.”

As stated in a separate email response to the U.S. Attorney’s office, former Strong & Hanni attorney Peter J. Baxter does not have any responsive documents in his possession.

We appreciate your assistance in this matter.

Very truly yours,

STRONG & HANNI



Michael J. Miller

cc: VIA U.S. MAIL AND E-MAIL
WITHOUT ENCLOSURES
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